

JANE ROE,  
  
Plaintiff,  
  
v.  
  
TREVOR FOLEY, in his official capacity  
as Director of the Missouri Department of  
Corrections, et al.,  
  
Defendants.

COMES NOW Counsel for Administratrix of Plaintiff's Estate, Latasha Marquitta Monroe, and respectfully requests that this Court grant Counsel leave to file unredacted copies of Exhibits A and B to the Motion for Substitution of Party under seal.

1. On July 14, 2023 this Court granted Plaintiff Jane Roe’s Motion to Proceed Under Pseudonym due to Plaintiff’s privacy interest in concealing her HIV status and protecting her physical safety. Docs. 2; 12, citing *W.G.A. v. Priority Pharmacy, Inc.*, 184 F.R.D. 616, 617 (E.D. Mo. 1999); *Roe v. Cty. Of N.Y.*, 151 F. Supp. 2d 495, 510 (S.D.N.Y. 2001).

2. On August 13, 2024, Plaintiff Jane Roe tragically passed away.

3. Counsel for Ms. Monroe, Administratrix of Plaintiff's Estate, intends to file a Motion for Substitution of Party and accompanying Exhibits A and B.

4. Exhibit A is confidential and needs to be filed under seal because it is a Death Certificate in Plaintiff's legal name.

5. Exhibit B is the Letters of Administration appointing Ms. Monroe as Administratrix of Jane Roe's Estate, which contain Jane Roe's legal name.

6. Because Exhibits A and B contain Plaintiff Jane Roe's legal name, Counsel respectfully requests that this Court grant them leave to file Exhibits A and B to their Motion for Substitution under seal as directed by the Parties' Protective Order. *See* Doc. 39.

7. Per the Western District of Missouri's Administrative Procedures Manual and Users Guide, Counsel emailed the proposed sealed documents, as well as the proposed Order, to Judge Wimes's courtroom deputy. *See* Western District of Missouri, CM/ECF Civil and Criminal Administrative Procedures Manual and Users Guide, <https://www.mow.uscourts.gov/sites/mow/files/AdministrativeGuideandUserManual.pdf>, at 7-8.

WHEREFORE, for these reasons, Counsel asks this Court for leave to file unredacted copies of Exhibits A and B to their Motion for Substitution of Party under seal.

Dated: February 25, 2025

Respectfully submitted,

By: /s/Susannah Porter Lake

**RODERICK & SOLANGE MACARTHUR  
JUSTICE CENTER**

Amy E. Breihan (MO Bar # 65499)

Shubra Ohri (MO Bar # 74116)

Susannah Porter Lake (MO Bar # 68758)

906 Olive Street, Suite 420

Saint Louis, Missouri 63101

Phone: (314) 254-8540

[shubra.ohri@macarthurjustice.org](mailto:shubra.ohri@macarthurjustice.org)

[amy.breihan@macarthurjustice.org](mailto:amy.breihan@macarthurjustice.org)

[Susie.lake@macarthurjustice.org](mailto:Susie.lake@macarthurjustice.org)

**LAMBDA LEGAL DEFENSE  
& EDUCATION FUND, INC.**

Richard Saenz\*  
Jose Abrigo\*  
120 Wall Street, 19th Floor  
New York, NY 10005  
Phone: (212) 809-8585  
rsaenz@lambdalegal.org  
jabrigo@lambdalegal.org

Kell Olson\*  
3849 E Broadway Blvd, #136  
Tucson, AZ 85716  
213-382-7600  
kolson@lambdalegal.org

*Attorneys for the Plaintiff*

*\*Admitted Pro Hac Vice*